
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT
: :
v. : Mag. No. 20-10421
: :
ESMELBY ESTEVEZ-CASTILLO, :
a/k/a "mybreakdownflow," :
a/k/a "mbdf" : :

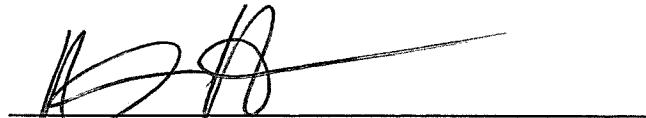
I, Heather J. Hendershot, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Special Agent Heather J. Hendershot
Federal Bureau of Investigation

Sworn to me telephonically
this 2nd day of December, 2020


Honorable Michael A. Hammer / Heather J. Hendershot
Honorable Michael A. Hammer
United States Magistrate Judge

ATTACHMENT A

Count 1

(Possession with Intent to Distribute & Distribution of Heroin)

From in or about March 2019 through at least on or about August 11, 2020, in Passaic County, in the District of New Jersey, and elsewhere, defendant

ESMELBY ESTEVEZ-CASTILLO,
a/k/a "mybreakdownflow,"
a/k/a "mbdf,"

did knowingly and intentionally distribute and possess with intent to distribute at least 100 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

ATTACHMENT B

I, Heather J. Hendershot, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

Heroin Parcels and Identification of Defendant

1. In or about January 2019, law enforcement, acting pursuant to a search warrant, seized and searched a parcel in Ohio that had originated in New Jersey (the “Ohio Parcel”), which was found to contain approximately one gram of a substance that field-tested positive for heroin. Law enforcement subsequently identified six additional parcels similar in key respects to the Ohio Parcel.

2. The Ohio Parcel bore a USPS Label 400 with a tracking number on its upper left-hand corner; a Priority Mail stamp on its upper right-hand corner; and an Avery-type rectangular mailing label listing the delivery and return addresses. In my training and experience, this arrangement of labels (the “Ohio Parcel Profile”) is not typical.¹

3. A review of U.S. Postal Service databases revealed that other parcels had been shipped from New Jersey bearing labels fitting the Ohio Parcel Profile and Label 400s with tracking numbers sequential to that of the Ohio Parcel.

4. Law enforcement subsequently searched for bulk purchases of Priority Mail stamps of the sort affixed to the Ohio Parcel. Law enforcement detected additional cash purchases of that stamp at a particular U.S. Post Office in northern New Jersey (“Post Office 1”). In my training and experience, such purchases are suspicious because, among other reasons, large purchasers of

¹ A USPS Label 400 (“Label 400”) is a tracking label available free of cost at any U.S. Post Office. Each Label 400 bears a bar code and a tracking number, which allow senders to track their shipments online. Label 400s are packaged in “books” of 50, which are then packaged in “packs” of 10 books, or 500 labels, all of which bear sequential tracking numbers.

stamps typically do not make such transactions in person, in cash, or at retail prices.

5. Law enforcement reviewed video surveillance footage from Post Office 1, which revealed that a single individual had obtained the same type of Priority Mail stamp, as well as the same types of envelopes and labels associated with the Ohio Parcel Profile, at Post Office 1 on multiple occasions.

6. This individual was observed on each occasion to make a cash purchase of approximately \$1,000 in postage, which, again, is an unusual purchasing pattern due to the bulk discounts widely available through subscription services such as Stamps.com. I know from my training and experience that such a pattern of overpayment in exchange for anonymity is typical of individuals who traffic narcotics through the U.S. Mail.

7. Law enforcement interviewed two employees of Post Office 1, each of whom remembered the purchaser of the large quantity of Priority Mail Stamps (the "Purchaser") as a Latino male with slightly curly black hair and short black facial hair. One of those employees recalled providing the Purchaser with a large stack of USPS Label 400s. That employee further stated that the Purchaser had left Post Office 1 in a light-colored, newer-model sport utility vehicle ("SUV").

8. Upon reviewing closed-circuit video recordings of Post Office 1's vestibule taken on or about February 19, 2019, the date of the purchase, the two employees separately identified the same individual as the Purchaser.

9. Video footage recorded by municipal traffic cameras near Post Office 1 on or about February 19, 2019 (the "February 19 footage") depicts an individual accessing a silver or gray Hyundai SUV in front of Post Office 1, along with a portion of the SUV's license plate number.

10. Using the February 19 footage, law enforcement identified the Hyundai SUV as likely registered to defendant Esmelby Estevez-Castillo ("Castillo").

11. The two Post Office 1 employees subsequently identified Castillo's driver's license photograph as depicting the Purchaser.

12. Law enforcement later reviewed U.S. Postal Service business records and databases to identify other parcels originating in New Jersey that bore Label 400s with tracking numbers sequential to those provided to the individual depicted in the Post Office 1 surveillance footage.

13. That review identified six additional parcels, all of which had originated in northern New Jersey and bore labels fitting the Ohio Parcel Profile and Label 400s with sequential tracking numbers, five of which had already been delivered.

14. On or about June 7, 2019, law enforcement seized and searched the sixth such parcel, pursuant to a search warrant, and found it to contain approximately 3.2 grams of a substance that was confirmed by a Thermoscientific TruNarc ("TruNarc") scan to contain heroin.

15. Subsequent law-enforcement surveillance revealed that Castillo resided at an address in Paterson, New Jersey (the "Paterson Address"), during the relevant period. Law enforcement observed Castillo frequently leaving the Paterson Address during morning hours and returning to it during evening hours, from at least as early as in or about August 2019 to as recently as on or about August 11, 2020.

Undercover Purchases of Heroin from mybreakdownflow/mbdf

16. From in or about September 2019 through at least in or about July 2020, an undercover law enforcement agent (the "UC") made a series of purchases of heroin from a vendor variously called "mybreakdownflow" and "mbdf" (unless otherwise specified, referred to collectively herein as "mybreakdownflow"). The UC initially made those purchases via online marketplaces located on the "darknet"—*i.e.*, websites hidden from public lookup and accessible only through an application that anonymizes visitors—where mybreakdownflow openly advertised his or her product as heroin. The UC later purchased heroin via direct online chats with an individual using the "mbdf" username. For each UC purchase, whether made via a darknet marketplace or by direct chat, the UC directed that the heroin be delivered to a particular New Jersey location used by law enforcement for investigative purposes. Nine parcels of heroin (collectively, "Parcels 1-9") were subsequently delivered to these controlled locations, each corresponding in timing and approximate amount to one of the UC's heroin purchases, and Castillo was observed by law enforcement to visit a storage unit and then a Post Office in succession during many of the relevant periods.

17. Each of Parcels 1-9 bore the same arrangement of labels as the Ohio Parcel Profile and the parcel found to contain heroin pursuant to the search warrant issued on or about June 7, 2020, as described above, except that Parcel 1 did not bear a Label 400. As previously noted, in my training and experience, this is not a typical arrangement of labels.

18. The USPS Label 400s used on Parcels 2 through 9 bore nearly sequential tracking numbers. In my training and experience, the use of sequential or nearly sequential tracking numbers typically indicates a single sender who obtained multiple USPS Label 400s with sequential numbers during a single Post Office transaction.

19. The UC's heroin purchases from mybreakdownflow/mbdf and other relevant events are as follows:

a. On or about September 13, 2019, the UC accessed a darknet marketplace ("DM1") and bought a heroin sample from mybreakdownflow for 0.00009683 Bitcoin ("BTC"),² or about \$1, directing that the heroin be shipped to the New Jersey Address. On or about September 23, 2019, a parcel ("Parcel One") was delivered to a controlled location in New Jersey (the "New Jersey Address"), which law enforcement found to contain approximately 0.2 grams of a substance that was confirmed by a TruNarc scan to contain heroin.

b. On or about October 7, 2019, the UC accessed DM1 and purchased one gram of heroin from mybreakdownflow for 0.01339426 BTC, or approximately \$107, directing mybreakdownflow to ship the heroin to the New Jersey Address. On or about October 24, 2019, a parcel ("Parcel Two") was delivered to the New Jersey Address, which law enforcement found to contain approximately 1.8 grams of a substance that was confirmed by a TruNarc scan to contain heroin.

c. On or about October 26, 2019, the UC accessed DM1 and purchased 10 grams of heroin from mybreakdownflow for 0.1107300 BTC, or approximately \$1,023, directing mybreakdownflow to ship the heroin to the New Jersey Address. On or about November 1, 2019, a parcel ("Parcel 3") was delivered to the New Jersey Address, which law enforcement found to contain approximately 12 grams of a substance that was confirmed by a TruNarc scan to contain heroin.

d. On or about November 10, 2019, the UC accessed DM1 and purchased 10 grams of heroin from mybreakdownflow for 0.01106100 BTC, or approximately \$1,000, directing mybreakdownflow to ship the heroin to the New Jersey Address. On or about November 21, 2019, a parcel ("Parcel 4"), was delivered to the New Jersey Address, which law

² Bitcoin is a virtual currency circulated over the Internet. It is not issued by any government, bank, or company, but rather is controlled through computer software operating via a decentralized peer-to-peer network.

enforcement found to contain approximately 11.1 grams of a substance that field-tested positive for the presence of heroin.

e. On or about December 2, 2019, the UC used an online messaging application to contact mybreakdownflow directly, using the "mbdf" username and the messaging application listed on mybreakdownflow's darknet marketplace profile. Through that online messaging application, the UC purchased 10 grams of heroin from mybreakdownflow for 0.15 BTC, or approximately \$1,008, directing mybreakdownflow to ship the heroin to the New Jersey address. On or about December 10, 2019, a parcel ("Parcel 5") was delivered to the New Jersey Address, which law enforcement found to contain approximately 11 grams of a substance that field-tested positive for the presence of heroin.

f. On or about January 6, 2020, the UC used an online messaging application to contact mybreakdownflow directly and purchased 10 grams of heroin for 0.142770 BTC, or approximately \$1,008, directing mybreakdownflow to ship the heroin to the New Jersey Address. Consistent with the January 6, 2020 UC purchase, on or about January 14, 2020, a parcel ("Parcel 6") was delivered to the New Jersey Address, which law enforcement found to contain approximately 12.1 grams of a substance that was confirmed by a TruNarc scan to contain heroin.

g. On or about January 7, 2020, law enforcement observed Castillo leaving the Paterson Address in a black Hyundai Palisade with a New Jersey license number beginning with G56 (the "black Hyundai") and driving to a storage facility located in Englewood, New Jersey (the "Storage Facility"). Law enforcement then observed Castillo leave the Storage Facility in the black Hyundai. Shortly thereafter, law enforcement observed Castillo exiting a U.S. Post Office located in Englewood, New Jersey (the "Englewood Post Office"), which is approximately two (2) blocks away from the Storage Facility, and re-entering the black Hyundai, which was parked in front of the Englewood Post Office. On the same day, law enforcement located six Priority Mail envelopes in the lobby drop slot of the Englewood Post Office, each listing a New Jersey business as the return address and each bearing the same arrangement of labels as the Ohio Parcel Profile. Law enforcement seized one of those six parcels, which was addressed to a location in Williamsburg, Pennsylvania (the "Pennsylvania Parcel"). The addressee of the Pennsylvania Parcel subsequently consented to a search of that parcel, which revealed that it contained approximately 30 grams of a substance that field-tested positive for heroin.

h. On or about January 19, 2020, the UC used an online messaging application to contact mybreakdownflow directly and purchased 10 grams of heroin for 0.12135026 BTC, directing mybreakdownflow to ship the heroin to the New Jersey Address. Consistent with that UC purchase, on or about January 24, 2020, a parcel ("Parcel 7") was delivered to the New Jersey Address, which law enforcement found to contain approximately 11.9 grams of a substance that was confirmed by a TruNarc scan to contain heroin.

i. On or about February 24, 2020, the UC used a direct online messaging application to contact mybreakdownflow directly and purchased 10 grams of heroin for 0.104424779 BTC, directing mybreakdownflow to ship the heroin to the New Jersey Address. On or about March 2, 2020, a parcel ("Parcel 8") was delivered to the New Jersey Address, which law enforcement found to contain approximately 11.1 grams of a substance that was confirmed by a TruNarc scan to contain heroin.

j. On or about March 3, 2020, the UC accessed a particular darknet marketplace ("DM 2") and purchased 1 gram of heroin from mybreakdownflow for 0.01410179 BTC, or approximately \$123. On or about March 11, 2020, a parcel ("Parcel 9") was delivered to a law-enforcement-controlled location.³ Law enforcement found Parcel 9 to contain approximately 1.7 grams of a substance that was confirmed by a TruNarc scan to contain heroin.

³ For operational reasons, Parcel 9 was delivered to a law-enforcement location other than the New Jersey address.